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MEMO ENDORSED

October 20, 2023

Hon. Sidney H. Stein
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *McNatt v. Prince, et al.*, No. 1:16-cv-8896-SHS (S.D.N.Y.) – Redaction and Sealing of Documents

Dear Judge Stein:

We represent Defendants Richard Prince, Blum & Poe, LLC, and Blum & Poe New York, LLC (collectively, “Defendants”) in the above-referenced case. We submit this letter pursuant to Section 5(B) of Your Honor’s Individual Practices.

Certain portions of the Memorandum of Law in Support of Defendants’ Motion for Security for Costs Pursuant to Local Rule 54.2, and the exhibits attached to the accompanying Declaration, have been designated by Plaintiff Donald Graham as “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only” (the “Protected Material”) under the Stipulated Protective Order entered in this case on January 29, 2018. The Protected Material includes information that Plaintiff has previously identified as confidential commercial/business information, non-public financial information, and/or confidential customer information. Accordingly, we respectfully request an Order permitting Defendants to file under seal documents containing purportedly Protected Material, and briefing papers to the extent they reflect any such Protected Material. Where possible and to the extent necessary, Defendants also request permission to file placeholders and/or redacted versions of such documents, testimony, and papers via ECF.

Thank you for your consideration of this important argument and issue.

Respectfully submitted,

cc: Counsel of Record (via ECF) Ian. C. Ballon
Defendants’ request to seal documents containing purportedly protected material and their request to file placeholders as set forth above is granted.

**Dated: New York, New York
October 23, 2023**

SO ORDERED:

Sidney H. Stein, U.S.D.J.

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